

# **EXHIBIT BB**

# Estate of Salvatore Lalicata

# VCF Documentation



September 11th  
Victim Compensation Fund

November 26, 2019

JOAN LALICATA  
116 STROUD AVENUE  
STATEN ISLAND NY 10312

Dear JOAN LALICATA:

The September 11th Victim Compensation Fund ("VCF") has reviewed your Eligibility Form. You submitted an Eligibility Form on behalf of SALVATORE LALICATA. Your claim number is VCF0126617. Your Eligibility Form was determined to be substantially complete on November 25, 2019. As stated in the Regulations and on the claim form, by filing a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit on behalf of the decedent and his or her survivors.

### **The Decision on your Claim**

The VCF has determined that the decedent has met the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, the decedent has been found eligible for the following injuries:

- MALIGNANT NEOPLASM - PANCREAS

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

### **What Happens Next**

**If the decedent was certified for treatment by the WTC Health Program for a condition not listed above**, you should amend your claim. Please see the VCF website for details on how to amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

**If you believe the decedent had eligible injuries not treated by the WTC Health Program** and you would like the VCF to consider those injuries before calculating the amount of any compensation, you should amend your claim. If you choose to amend your claim, you will need to use the VCF Private Physician process. The Private Physician process is a way for the VCF to gather the required information about the decedent's treatment in order to process your claim.





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All forms are available on the VCF website under "Forms and Resources." The website also includes detailed information and instructions on the Private Physician process.

**If the decedent did not have injuries other than those listed above,** you should submit your Compensation Form and required supporting materials. If you have already submitted your Compensation Form, you do not need to take any action at this time unless you receive a request from the VCF for missing information. The VCF will calculate the amount of any compensation based on the conditions listed above after all compensation-related documents are submitted.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: WENDELL TONG



September 11th  
Victim Compensation Fund

December 23, 2019

JOAN LALICATA  
116 STROUD AVENUE  
STATEN ISLAND NY 10312

Dear JOAN LALICATA:

The September 11th Victim Compensation Fund ("VCF") has reviewed your claim for compensation. Your claim number is VCF0126617. Your Compensation Form was determined to be substantially complete on December 12, 2019. This means your claim was deemed "filed" for purposes of section 405(b)(3) of the Statute on that date.

Based on the information you submitted, the VCF has calculated the amount of your award as **\$666,098.58**. This determination is in accordance with the requirements of the Never Forget the Heroes: James Zadroga, Ray Pfeifer, and Luis Alvarez Permanent Authorization of the September 11th Victim Compensation Fund Act ("VCF Permanent Authorization Act"). The enclosed "Award Detail" includes a detailed explanation of the calculation and a list of the eligible conditions included in this determination.

No non-routine legal service expenses are approved for reimbursement for this claim.

As the Personal Representative, you are required to distribute any payment received from the VCF on behalf of the victim to the eligible survivors or other recipients in accordance with the applicable state law or any applicable ruling made by a court of competent jurisdiction or as provided by the Special Master.

### **What Happens Next**

The VCF will deem this award to be final and will begin processing the payment on your claim unless you complete and return the enclosed Compensation Appeal Request Form within **30 days from the date of this letter** as explained below. If you do not appeal, the Special Master will authorize the payment on your claim within 20 days of the end of the 30-day appeal period. Once the Special Master has authorized the payment, it may take up to three weeks for the United States Treasury to disburse the money into the bank account designated on the VCF ACH Payment Information Form or other payment authorization document you submitted to the VCF.

- **Appealing the Award:** You may request a hearing before the Special Master or her designee if you believe the amount of your award was erroneously calculated or if you believe you can demonstrate extraordinary circumstances indicating that the award does not adequately address your claim. **If you choose to appeal, your payment will not be processed until your appeal has been decided.**

To request a hearing, you must complete and return the enclosed Compensation Appeal Request Form **and** Pre-Hearing Questionnaire no later than **30 calendar days**



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from the date of this letter. The VCF will notify you in writing of your scheduled hearing date and time and will provide additional instructions to prepare for your hearing. If both forms are not submitted with complete information within 30 days, you have waived your right to appeal and we will begin processing your payment.

- **Amending your Claim:** You may amend your claim in the future if your circumstances change and you have new information to provide to the VCF that you believe warrants additional compensation. The VCF website has important information about the specific circumstances when it is appropriate to request an amendment. For more information and examples of such situations, please refer to “Section 5 – Amendments” in the VCF Policies and Procedures document available under “Forms and Resources” on the VCF website. Please review the information carefully when deciding whether to amend your claim. If you submit an amendment, the VCF will review the new information and determine if it provides the basis for a revised decision.
- **Notifying the VCF of new Collateral Source Payments:** You must inform the VCF of any new collateral source payments you receive, or become entitled to receive, such as a change to your disability or survivor benefits, as this may change the amount of your award. If you notify the VCF within 90 days of learning of the new collateral source payment, your award will not be adjusted to reflect the new entitlement or payment. If you notify the VCF more than 90 days after learning of the new or revised entitlement or payment, the VCF may adjust your award to reflect the new payment as an offset, which may result in a lower award. If you need to notify the VCF of a new collateral source payment, please complete the “Collateral Offset Update Form” found under “Forms and Resources” on the [www.vcf.gov](http://www.vcf.gov) website.

Your award was calculated using our published regulations, and I believe it is fair and reasonable under the requirements of the VCF Permanent Authorization Act. As always, I emphasize that no amount of money can alleviate the losses suffered on September 11, 2001.

If you have any questions, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: WENDELL TONG



September 11th  
Victim Compensation Fund

## Award Detail

Claim Number: VCF0126617  
Decedent Name: SALVATORE LALICATA

PERSONAL INJURY CLAIM (Losses up to Date of Death)	
<b>Lost Earnings and Benefits</b>	
Loss of Earnings including Benefits and Pension	\$0.00
Mitigating or Residual Earnings	\$0.00
<b>Total Lost Earnings and Benefits</b>	<b>\$0.00</b>
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Disability Pension	\$0.00
Social Security Disability Benefits	\$0.00
Workers Compensation Disability Benefits	\$0.00
Disability Insurance	\$0.00
Other Offsets related to Earnings	\$0.00
<b>Total Offsets Applicable to Lost Earnings</b>	<b>\$0.00</b>
<b>Total Lost Earnings and Benefits Awarded</b>	<b>\$0.00</b>
<b>Other Economic Losses</b>	
Medical Expense Loss	\$0.00
Replacement Services	\$0.00
<b>Total Other Economic Losses</b>	<b>\$0.00</b>
<b>Total Economic Loss</b>	<b>\$0.00</b>
<b>Total Non-Economic Loss</b>	<b>\$250,000.00</b>
<b>Subtotal Award for Personal Injury Claim</b>	<b>\$250,000.00</b>



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<b>DECEASED CLAIM (Losses from Date of Death)</b>	
<b>Loss of Earnings including Benefits and Pension</b>	
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Survivor Pension	
SSA Survivor Benefits	
Worker's Compensation Death Benefits	
Other Offsets related to Earnings	
<b>Total Offsets Applicable to Loss of Earnings and Benefits</b>	
<b>Total Lost Earnings and Benefits Awarded</b>	\$0.00
<b>Other Economic Losses</b>	
Replacement Services	\$57,185.00
Burial Costs	\$9,168.58
<b>Total Other Economic Losses</b>	\$66,353.58
<b>Total Economic Loss</b>	\$66,353.58
<b>Non-Economic Loss</b>	
Non-Economic Loss - Decedent	\$250,000.00
Non-Economic Loss - Spouse/Dependent(s)	\$100,000.00
<b>Total Non-Economic Loss</b>	\$350,000.00
<b>Additional Offsets</b>	
Social Security Death Benefits	(\$255.00)
Life Insurance	\$0.00
Other Offsets	\$0.00
<b>Total Additional Offsets</b>	(\$255.00)
<b>Subtotal Award for Deceased Claim</b>	\$416,098.58



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<b>Subtotal of Personal Injury and Deceased Claims</b>	\$666,098.58
PSOB Offset	\$0.00
Prior Lawsuit Settlement Offset	\$0.00
<b>TOTAL AWARD</b>	<b>\$666,098.58</b>
<b>Factors Underlying Economic Loss Calculation</b>	
Annual Earnings Basis (without benefits)	
Percentage of Disability attributed to Eligible Conditions - applicable to Personal Injury losses	
Start Date of Loss of Earnings Due to Disability - applicable to Personal Injury losses	

<b>Eligible Conditions Considered in Award</b>
Malignant Neoplasm - Pancreas

# Family Member Affidavits

Ellen Astarita



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF ELLEN  
ASTARITA**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK        )  
                                      : SS  
COUNTY OF RICHMOND    )

ELLEN ASTARITA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 194 Shirley Avenue, Staten Island, New York, 10312.
2. I am currently 59 years old, having been born on October 2, 1963.
3. I am the daughter of Decedent, Salvatore Lalicata, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.
4. My father passed away from pancreatic cancer on January 14, 2017, at the age of 77. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My father, Salvatore Lalicata, played a major role in my life. He was such a wonderful person to me and everyone he met. He taught me patience, love, and kindness. From an early age, I witnessed first-hand an example of what a good parent needs to be. My father had a great passion of the Catholic Church. Even though we did not have a lot of money growing up, he still made Catholic school a priority for me, as well as my brothers and sisters. We all attended Our Lady Star of the Sea grammar school on Staten Island. My father, seeing that I was struggling academically, helped me with every homework assignment, test, Art, and Social Studies project. He attended every school function with pride. He taught me how to cook, and we loved making artichokes together. As adults, we spoke and had meals almost every weekend. When I got my first job at the Marina Café on Staten Island as a bus girl, he would drive not only me, but my girlfriends as well, back, and forth to work. He did not care how late we ended our shift, his car was always parked in front of the restaurant, ready to take us home. When I grew up and had my own children, I led them, by my father's example. Throughout high school, my sons volunteered their time on the weekends at our local Meals on Wheels. On the weekends, they delivered hot and cold meals to the elderly and homebound of Staten Island. My sons and their friends formed a Meals on Wheels Teen Council Committee, where they would do fundraisers at our local church. My father played a major role in helping out with their Meals on Wheels Teen Council Flea Market Fund Raiser and attended all of their pasta night fundraisers. My father was also an employee at Diawa Securities from December of 1994, through his retirement in March of 2004.

6. On September 11, 2001, my father arrived at his place of work, Diawa Securities. He traveled on the Staten Island rapid transit, and then would take the Staten Island Ferry. Once

he arrived in Manhattan, he walked to Financial Square, located at 32 Old Slip, NY, NY 10005. This location was only a few blocks away from the Twin Towers. As the tragedy was unfolding, my father ran through the streets of lower Manhattan, through the dust bowl to catch the last ferry back to Staten Island. He came home covered in soot. A few weeks later, he returned to work. He remained working at Diawa Securities until he retired in March of 2004.

7. I witnessed first-hand the start of my father's symptoms. I observed his health as it declined. He became depleted of strength and energy. His symptoms worsened as time went by. His pain became unmanageable. My father was diagnosed with pancreatic cancer in September of 2016. This debilitating disease significantly impacted his quality of life. He endured grueling chemotherapy treatments. Soon after his diagnosis, my father had to endure the many side effects from chemotherapy. He had abdominal pain, nausea, a fever, and suffered from exhaustion. The cancerous growths consumed his pancreas despite all the medication and treatments that were given to keep him alive. The cancer would then metastasize to his liver and lungs. We decided as a family that we would stay by his side during his last days, as he received service from Staten Island University Hospice.

8. My father lost his vigor and vitality due to this illness from the 911 attacks. I lost my father who did so many things with me and my children. He was a big part of my household. Me and my husband counted on my father to pick up my children from school events and my oldest disabled son from therapy. I counted on him to always be there when something broke in my house while my husband was away working at the firehouse. I can no longer taste the meals he would prepare or go to the movie, or travel with him on vacation. I no longer have a father who can give me guidance or love. This was a tremendous loss for me and my entire family. I miss him every day.

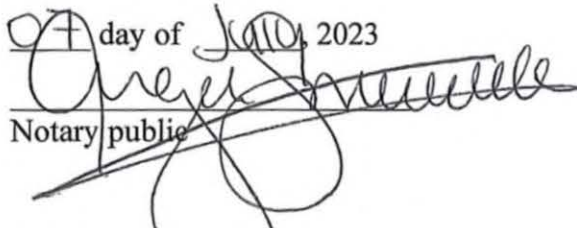


ELLEN ASTARITA

Sworn before me this

07 day of July, 2023

Notary public



ANGELA M SPECIALE  
NOTARY PUBLIC, STATE OF NEW YORK  
01SP6390180  
QUALIFIED IN RICHMOND COUNTY  
COMMISSION EXPIRES APRIL 8, 2027

Joanne DeSilva



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF JOANNE  
DESILVA**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW JERSEY     )  
                                      : SS  
COUNTY OF MONMOUTH )

JOANNE DESILVA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Heather Hill Way Holmdel, New Jersey 07733.

2. I am currently 56 years old, having been born on March 21, 1967.

3. I am the daughter of Decedent, Salvatore Lalicata, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on January 14, 2017, at the age of 77. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My father, Salvatore Lalicata, was a wonderful man. He had never hesitated to demonstrate his affection, and I had always felt cherished and valued in his presence. Growing up I look back on myself as the wild child. Always seeking good, clean, happy fun at an above average level than most. My father had celebrated and embraced my uniqueness. Whether I was blasting music in my bedroom or dancing and skipping through the kitchen as he ate, he just smiled or laughed, whichever came first. My friends would come over often for dance parties and he had a look filled with unconditional love, admiration that just made me feel it was a wonderful quality to be silly and enjoy moments without worry. Because of his consistent, unwavering love, and the values he instilled in me, I am the woman I am today, successful in every way. In work, family, and life I do what I love and enjoy the ride of life every day. I have a strong sense of self-identity and self-worth because of his love. He gave me this confidence to overcome any obstacle in life, to not take life too seriously. For this I am forever grateful. My father never missed a beat in my life. He encouraged the sport of Track, where he was avid in during his high school years. A great memory was seeing our names in the paper for attending Track meets in the rain. My father always did "what's right", and to today, I follow this lesson and have gained inner peace in my life. He attended every gymnastic meet, girl scout milestone and school play to name a few. Always there and always proud. Every Saturday, my father and my mother would pack us in the station wagon and take us to see our grandparents in Queens, then to mass on Sundays. All five children, no matter the age, would chant funny, made-up songs so they would take us for donuts! My father had great patience. In July of 1986, I joined the banking workforce in New York City. I was lucky enough to tag along with my dad and travel to work. We left



home every morning to board the 7:38am train from our hometown in Eltingville, Staten Island, then take the 8:15am Staten Island Ferry to downtown Manhattan. My father worked at Diawa Securities. Our travel routine lasted over 15 years. We travelled all those years with a few of his friends and me. My father had an incredible sense of humor. He had a unique ability to bring laughter and joy to all, even by just quoting all the funny movies we'd watched through the years. His humor was witty and his laughter contagious. Our travel was memorable and certainly not dull.

6. I was working at my current office (MUFG) located across the Hudson River in Jersey City. I had perfect view of this horrific terrorist attack. My father was in the surrounding buildings of the World Trade Center, Diawa Securities, and all I recall from the moment the second plane hit the 2nd tower, we were under attack and my father was in the middle of this war zone. With that immediate thought in mind, I recall bending down and placing my hands on my stomach in fear. I was 6 months pregnant. A moment later, my work phone rang, and it was my mother, who let me know immediately, "he is evacuating his building". As my building was also being evacuated, and did not have a cell phone, I still had the fear my father would not make it home. Knowing who my father was, always doing "what's right", he supported others. I do know that he was in the haze for the entire day, supporting others, and made it to the last Ferry to Staten Island. His body and clothes were coated in soot, so he placed them on his life vest. As there was damage to my father's building, after about two-three weeks, he was able to return to the office and continued to work there until retirement for over three years.

7. Sometime after 9/11, we all noticed subtle shifts in his health. We saw weariness, discoloration in his eyes and decline in his normal energetic self. In 2016, we all had concerns, and my mother and sister Barbara took him to the doctor often to try and understand this decline



we were all witnessing. After many tests and visits, there was no answer, until my father had a severe pain in his back. My mother and sister took him to the emergency room. It was soon after that, my father was struck with the devastating news that he had pancreatic cancer, and that it was already stage 4. We were all filled with a multitude of emotions that ranged from shock and fear to sadness and disbelief. My father declined rapidly and painfully. It was difficult for him and all of us to witness. I knew my father was not ready to leave us. He had plans to attend his annual golf outing in Florida with 40 other golfers. This was not meant to be. We were there for my father and mother every step of the way, until his last breath.

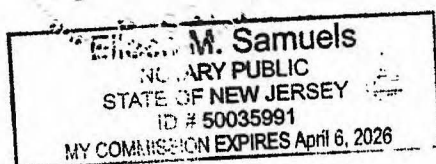
8. I loved my father so very much. The pain and grief that accompany such a loss are immeasurable and the void left behind can feel overwhelming. My guiding presence has left me. It's upsetting to see what my father has missed. To see my mother without her loving husband to share all their children's and grandchildren's milestones is tough for all, including extended family and friends. This was not meant to be. As I matured, married, and have one son, my father was there for every event in our lives, with my mother by his side the entire time. He loved my mother with his every being. My father was not ready to leave this earth, we had much more of his life to share and memories to cherish, but they were taken from all of us too soon.

Sworn before me this

19<sup>th</sup> day of July, 2023

Eileen M. Samuel

Notary public



  
JOANNE DESILVA

Barbara Lalicata

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF BARBARA  
LALICATA**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK        )  
                                  : SS  
COUNTY OF RICHMOND )

BARBARA LALICATA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 116 Stroud Avenue Staten Island, New York 10312.

2. I am currently 61 years old, having been born on May 10, 1962.

3. I am the daughter of Decedent, Salvatore Lalicata, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on January 14, 2017, at the age of 77. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.



5. My father, Salvatore Lalicata, was a wonderful man. He played a major role in my life and the lives of my younger siblings. My father was a special person and mentor who did right by everyone with truth and honesty. He had a warm and generous heart. He showed me patience and security. I lived in our parents' home with him and my mother for over 50 years. Every day we would speak to each other and share a meal together. Anytime I had a school function, my father was always there in attendance. When I had gotten my first job, he would drive me back and forth, the same was done for all my after-school activities such as basketball and cheerleading. My father worked at Diawa Securities from December 1994 until he retired in March of 2004.

6. On September 11, 2001, my father arrived at his place of work, Diawa Securities. He would travel on the Staten Island rapid transit, then onto the Staten Island Ferry. Once he arrived in Manhattan, he walked to Financial Square, located at 32 Old Slip, NY, NY 10005. This location was just a few blocks from the twin towers. As the tragedy was unfolding, my father ran through the streets of lower Manhattan, through the dust bowl to catch the last ferry back to Staten Island. He came home covered in soot. A few weeks later he returned to work. He remained working at Diawa Securities until he retired in March of 2004.

7. As an x-ray technician at Staten Island University Hospital, I witnessed first-hand the start of my father's symptoms. I observed his health as it declined. He became depleted and had lost all his strength and energy. His symptoms had just gotten worse. His pain became unmanageable. My father was diagnosed with pancreatic cancer in September of 2016. This debilitating disease impacted the quality of his life significantly. He endured grueling chemotherapy treatments. Soon after his diagnosis, my father had to endure the many side effects of chemotherapy. He would experience abdominal pain, nausea, exhaustion, as well as a fever.

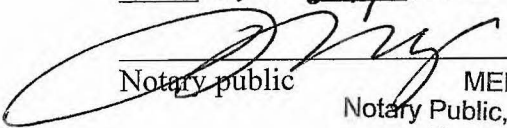
Despite the treatment and medication's efforts to keep him alive, cancerous growths consumed his pancreas. The cancer would then metastasize to his liver and lungs. As a family we had decided to stay beside him during his last days, as he received services from the Staten Island University Hospice Care.

8. Due to his illness stemming from the 9/11 attacks, my father had lost his vigor and vitality. I lost my father, who would accompany me during Sunday mass. I can no longer taste the meals he would prepare for us, or go to the movies with him, or travel with him on vacation. I no longer have a father who can give me guidance or love. The loss of my father was tremendous for me as well as my entire family, and I miss him every day.

  
BARBARA LALICATA

Sworn before me this

13 day of July, 2023

  
Notary public

MEI W. YAN  
Notary Public, State of New York  
No. 01YA6315082  
Qualified in Richmond County  
Commission Expires, November 17, 2026

Joan Lalicata

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF JOAN  
LALICATA**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK       )  
                                      : SS  
COUNTY OF RICHMOND )

JOAN LALICATA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 116 Stroud Avenue Staten Island, New York 10312.

2. I am currently 82 years old, having been born on December 13, 1940.

3. I am the wife of Decedent, Salvatore Lalicata, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of the claim on behalf of my husband's estate and for my solatium claim.

4. My husband passed away from pancreatic cancer on January 14, 2017, at the age of 77. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. On April 11, 2018, I was issued Letters Testamentary on behalf of my husband's



estate by the Richmond County Surrogate's Court.

6. Salvatore and I met in the study hall at William Cullen Bryan High School in Astoria Queens, NY. It was the Fall of 1957, I was sixteen years old, and he was seventeen. Sal was on the track team, and I was the captain of the twirlers. We dated for a period of time, and when we turned 21, we decided to get married. Our wedding took place on July 8, 1961, at St. Mary's Church in Woodside Queens, New York. Soon after, we had our first child, followed by four more. We started out living in a small apartment in Queens, then moved to Staten Island before our last child was born. When the children were small, we spent our weekends visiting families for Sunday dinners. We would travel with our children whenever we got the chance. We went to places such as beaches in New Jersey, Niagara Falls, amusement parks, Washington D.C., Arizona, and Lake George. We enjoyed spending time with our children and had a lot of fun times. My husband was an accounts payable supervisor for Daiwa Securities from December 12, 1994, until he retired in March of 2004, in New York City. He was also a lifetime member of the La Tourette Golf Club and was in many golf tournaments. Salvatore was an active parishioner at Holy Child Church in Staten Island and was a faithful member of the Roman Catholic Adoration Society.

7. On September 11, 2001, my husband arrived at work after taking the Staten Island Rapid Transit to the Staten Island Ferry. He arrived in Manhattan and walked to Financial Square, 32 Old Slip, New York, New York 10005. This was just a few blocks from the twin towers. Once he decided the situation was too severe to stay put, he rushed to the ferry terminal and headed back to Staten Island. He came back home completely covered in soot. A few weeks later, he was told it was okay to return to work. He continued to travel through the exposure zone until he retired in March of 2004.

8. A few years after he had retired, symptoms started to show of his illness. He was



often weak, depleted of strength and energy, lost weight, and suffered with stomach pain. In September of 2017, the doctors diagnosed Sal with pancreatic cancer. This disease impacted his quality of daily life severely. He went through many types of treatments, including chemotherapy. Sal took many medications during this time such as Fentanyl, Oxycodone and Morphine. His chemotherapy would cause side effects such as exhaustion, abdominal pain, nausea as well as a fever. Because of this, he was in great discomfort on top of the discomfort he was already undergoing due to the cancer itself. The cancer would then metastasize to his other organs. This would ultimately lead to him being placed in hospice, in which I decided he should pass away at home surrounded by family.

9. Prior to his illness, Sal attended church, went on vacations with our children and grandchildren, cooked with me for every holiday. Before his symptoms arose, Sal did all of the household maintenance for our home and our children's homes. In earlier years, Salvatore painted, put up curtains, hung pictures, did plumbing, deck work, removed snow, drove, shopped, cooked, cleaned, and had a vegetable garden. I now pay for all work done at our home because of his absence. My husband suffered for many years before his diagnosis, and our family has suffered a tremendous loss.

  
JOAN LALICATA

Sworn before me this

11 day of July, 2023

  
Notary public

MEI W. YAN

Notary Public, State of New York

No. 01YA6315082

Qualified in Richmond County

Commission Expires, November 17, 2026

Joseph Lalicata

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF JOSEPH  
LALICATA**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK       )  
                                      : SS  
COUNTY OF RICHMOND    )

JOSEPH LALICATA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 93 Maine Road Staten Island, New York 10314.

2. I am currently 53 years old, having been born on February 6, 1970.

3. I am the son of Decedent, Salvatore Lalicata, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on January 14, 2017, at the age of 77. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.



5. My father joined Diawa Securities on December 12, 1994, and he had a routine of commuting using public transportation. I was fortunate enough to accompany him on many of these journeys while I lived at home and worked in the city. My dad was more than just a father to me. My dad was my guiding light, my source of strength, and my role model. He taught me countless lessons that have shaped me into the person I am today. I always share the stories of my father with my kids so that they know just how much of an incredible person he was. I will ensure that they understand the love and wisdom that flowed through his veins. They may not have the privilege of meeting him in person, but they will feel his spirit through the love and stories that I share.

6. On that fateful day, September 11, 2001, my father had reached Diawa Securities in New York City. He walked to Financial Square at 32 Old Slip, NY, NY 10005, which was situated downtown, mere blocks away from the Twin Towers. As events unfolded and the magnitude of the situation became apparent, he hurriedly made his way through the dust-filled streets to catch the last ferry back to Staten Island. When he arrived home, he was covered in soot, a stark reminder of the chaos and devastation he had witnessed. It took a few weeks for him to receive clearance to return to work, and he continued working in the exposure zone until his retirement in March of 2004.

7. My father's strength and energy slowly diminished, leaving him feeling depleted. With each passing day, his symptoms worsened, and the pain became unbearable. It was in September of 2016 when my father received the devastating diagnosis of pancreatic cancer. This insidious disease had a profound impact on his overall well-being, significantly diminishing his quality of life. He embarked on a grueling journey of chemotherapy treatments, enduring the physical and emotional toll they exacted. The side effects of the chemotherapy treatments were

relentless, causing him abdominal pain, nausea, fevers, and overwhelming fatigue for the remainder of his time. This illness, stemming from the aftermath of the 9/11 attacks, robbed my father of his vigor and vitality. It was a cruel reminder of the enduring effects of that tragic day. The weight of witnessing the destruction and inhaling the toxic fumes took a toll on his body, manifesting in the form of pancreatic cancer. Despite the countless medications and treatments administered to prolong his life, the cancerous growths mercilessly consumed his pancreas. It didn't stop there; the cancer metastasized to his liver and lungs, further exacerbating his condition. Despite his valiant effort and our unwavering support, the disease took its toll, ultimately claiming his life. As a family, we made the decision to stand united by his side during his final days. We sought the compassionate care provided by Staten Island University Hospice, ensuring that he received the support and comfort he needed.

8. It's been a while since my father left me, and not a day goes by without feeling the immense void that his absence has created. The pain of losing him is still fresh, as if time has stood still since that fateful day. I find myself longing for his comforting presence, for the sound of his voice, and for the reassuring warmth of his hugs. Losing my father has taught me the true depth of loss and the profound impact it has on my life. But now, I'm left with a heavy heart, knowing that there are lessons I will never get to hear directly from him again. There are pieces of wisdom and knowledge that only he possessed, and I mourn the missed opportunity to learn from his vast experiences. As I journey through life without him, I can't help but imagine the moments he'll never witness. He won't be there to see the milestones of my life. He won't be there to witness the joy on my face as I achieve my goals, to share in the triumphs and the joys that life brings. He won't be there to watch me walk my daughter down the aisle on her wedding day, to offer his fatherly advice and share in the happiness of that moment. Most heartbreaking of all, he won't be there to

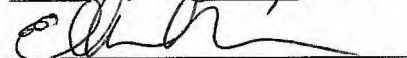


watch his grandchildren grow, and watch them grow into the incredible human beings they are destined to be. Despite the pain, I carry his memory with me every step of the way. I remember the love and support he showered upon me, the values he instilled in me, and the unconditional love that radiated from his heart. His presence may no longer be physical, but his spirit lives on within me, guiding me through life's challenges and reminding me to cherish every moment. I honor my father's memory by living a life that reflects the principles he taught me. I will strive to be the best version of myself, to embrace the values he held dear, and to make him proud every single day. Though he may not be physically present to witness it, his influence will forever be engraved in my heart, and the choices I make. I miss my dad, more than words can express. The pain of losing him may never completely fade, but I find solace in the memories shared and the lessons he imparted. I had the best father any man could have ever asked for. He will always be in my heart, guiding me and reminding me of the incredible love that binds me eternally.

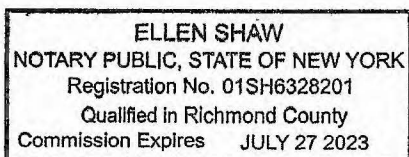
  
JOSEPH LALICATA

Sworn before me this

05 day of July, 2023



Notary public



Michael Lalicata

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF MICHAEL  
LALICATA**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW JERSEY     )  
                                      : SS  
COUNTY OF MONMOUTH )

MICHAEL LALICATA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 13 Newland Place Aberdeen, New Jersey 07747.
2. I am currently 57 years old, having been born on September 22, 1965.
3. I am the son of Decedent, Salvatore Lalicata, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.
4. My father passed away from pancreatic cancer on January 14, 2017, at the age of 77. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.



5. My father, Salvatore Lalicata, was an amazing man. He worked at Diawa Securities from December 1994, until he retired in March of 2004. My father and I did many things together. He was the leader of my boy scout troop back when I was in grade school. He drove me back and forth to work when I started my first job, washing dishes at a local restaurant. For many years we would go to church together, and he would attend all my school events. He was so proud of me when I joined the United States Marine Corps, and then when I became a member of the Local 3 Electrical Union. We had a close relationship throughout the years, until he passed away on January 14, 2017. We would speak to each other almost every day.

6. On September 11, 2001, my father arrived for work at Diawa Securities. He traveled to work using the Staten Island Rapid Transit, and then took the Staten Island Ferry. Once he arrived in Manhattan, he walked to Financial Square, which was located at 32 Old Slip, NY, NY 10005. Here, he was just a few blocks away from the Twin Towers. As the tragedy was unfolding, my father traveled through the dust to catch the last ferry back to Staten Island. He came home covered in soot. A few weeks later, he returned to work and would continue working until he retired in March of 2004.

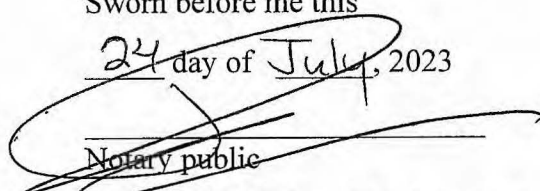
7. After a few years later, he became depleted of strength and energy. His symptoms had worsened. I watched this once strong man, suffer with abdominal pain, and lose weight. Then, in September of 2016, my father had been diagnosed with pancreatic cancer. This debilitating disease had significantly impacted his quality of life. Soon after his diagnosis, my father would have to endure the many side effects of chemotherapy. He had abdominal pain, nausea, suffered exhaustion, and would have a fever. The cancerous growths would soon consume his pancreas, despite all the treatment and medication used to keep him alive. The cancer would then spread to

his other organs. My brothers, sisters, and I stayed in his home while my father received services from Staten Island University Hospice Care.

8. My father was always an outstanding parent to me and my siblings. He had many friends and was an active member of the La Tourette Gold Club. He always attended Sunday mass and was a faithful member of the Adoration Society at the Holy Child Church in Staten Island. My father hosted a Super Bowl Breakfast every year, welcoming friends, neighbors, and relatives into his home. He enjoyed cooking. He also had a bountiful vegetable garden in his backyard. He helped me with projects inside and outside of my home. This was a tremendous loss for me and my entire family.

  
MICHAEL LALICATA

Sworn before me this

  
24 day of July, 2023

Notary public

RANDI TRAVIS  
Notary Public - State of New Jersey  
My Commission Expires Dec 11, 2024